

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BETHANY DITZLER,

Plaintiff,

V.

**PINNACLEHEALTH OBSTETRICS
AND GYNECOLOGY SPECIALISTS,
PINNACLEHEALTH MEDICAL
SERVICES, UPMC PINNACLE
HOSPITALS, UPMC PINNACLE,
BEVERLY A. HALL NDLOVU,
and LEE BLECHER,**

Defendants.

[illegible]

NO. 21-CV-1852

JUDGE CONNER

ELECTRONICALLY FILED

**JOINT MOTION FOR ENTRY OF CONFIDENTIALITY AND
PROTECTIVE ORDER**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, the Parties, by and through their respective counsel, hereby jointly move for entry of a Confidentiality and Protective Order. In support of this Joint Motion, the parties submit the attached proposed Confidentiality and Protective Order.

Respectfully submitted,

/s/ Frank J. Brier

Frank J. Brier

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Dated: May 4, 2023

CERTIFICATE OF CONCURRENCE/NON CONCURRENCE

I, Frank J. Brier, hereby certify that I sought concurrence from all counsel of record. All counsel concur in this Joint Motion.

/s/ Frank J. Brier

Date: May 4, 2023

CERTIFICATE OF SERVICE

I, Frank J. Brier, hereby certify that a true and correct copy of the foregoing Joint Motion was served upon the following counsel of record via the Court's ECF system on this 4th day of May 2023:

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/s/ Frank J. Brier
Frank J. Brier